



September 20, 2024

VIA PACER

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED**

VERNON S. BRODERICK

U.S.D.J. 9/23/2024

Re: Rachel Meyers v. PATH, et al.; Civil Action No.: 1:20-cv-09645-VSB

Dear Judge Broderick:

At the post-discovery telephone conference held on September 10, 2024, Your Honor directed the parties to meet and confer regarding certain redactions and privacy issues PATH cited in response to Plaintiff's November 10, 2023 request for production of documents, as well as certain new requests for documents Plaintiff intended to make. Specifically, Plaintiff indicated that two items remained outstanding: (1) the employment files of the other trainees in her class, and (2) the employment files of the instructors who taught the class.

Yesterday, at 3:30 p.m., I receive an email from Plaintiff with an attached PDF. A preliminary review of this document reveals that it has ten clarifications of previous requests and ten new requests for production of documents.

This morning, I emailed Plaintiff and asked her consent for a one-week adjournment of our joint letter to the Court concerning these requests and the parties' positions on them. I requested this adjournment due to the volume of these requests and because PATH would not be able to adequately respond to Plaintiff by today and then have time to file a joint letter to the Court on the parties' positions after meeting and conferring.

Plaintiff responded this afternoon and has given her consent to this one-week adjournment.

For the above reasons, PATH respectfully requests a one week adjournment so that the parties can have adequate time to meet and confer on these issues.

Respectfully submitted,

By: /s/ Thomas R. Brophy
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cc: Pro Se Plaintiff Rachel Meyers
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